

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA DIVISION**

**TERPSEHORE MARAS,**

**Plaintiff,**

**v.**

**REPRESENTATIVE STEVE COHEN, US  
DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA and ALI  
ABDUL RAZAQ AKBAR A/KA/ ALI  
ALEXANDER,**

**Defendants.**

**Case. No. 1:21-cv-00317-DCLC-CHS**

**JUDGE CLIFTON L. CORKER**

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**PLAINTIFF'S MOTION FOR STATUS CONFERENCE OR ORDER COMPELLING  
DEFENDANT ALI ABDUL RAZAK AKBAR A/K/A ALI ALEXANDER TO RESPOND  
TO PLAINTIFF'S AMENDED VERIFIED COMPLAINT**

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COMES NOW Plaintiff Terpsehore Maras and, by and through undersigned counsel and pursuant to Fed. R. Civ. P. 16 (a) and (f), hereby files this Motion for Status Conference to discuss next steps on how to proceed with Defendant Ali Abdul Razaq Akbar a/k/a Ali Alexander (hereinafter "Defendant Akbar").

As grounds for said motion, Plaintiff respectfully shows this Honorable Court that Defendant Akbar has been served on four separate occasions, but refuses to file a responsive pleading or a motion as required by law. On November 29, 2021, Defendant Akbar was served via hand delivery by Jake Armstrong. *See* Doc. No. 73-1. On November 30, 2021, Defendant Akbar was served again via Certified Mail, Signature Requested, but said package was returned to sender as "UNCLAIMED" because the resident who answered the door refused to sign for the package. *See* Doc. No. 73-2. On

**February 12, 2022** Defendant Akbar was served again via Certified Mail, Signature Not Requested, and said package was delivered to an individual at Defendant Akbar's residence. *See* Doc. No. 50. On **March 9, 2022**, Defendant Akbar was served again via e-mail by way of Defendant Akbar's attorney (but not for this case), G. Baron Coleman. *See* Doc. No. 65. In summary, Defendant Akbar has been served via: (1) Hand Delivery; (2) Certified Mail Signature Requested (but returned for refusal to sign); (3) Certified Mail Signature Not Requested (and left with an individual at Defendant Akbar's residence); (4) Via e-mail to Defendant Akbar's lawyer.

Further, Plaintiff shows this Honorable Court that she does not want default judgment. Instead of default judgment, Plaintiff respectfully requests either a status conference, pursuant to Fed. R. Civ. P. 16(a) or an Order compelling Defendant Akbar to respond to Plaintiff's Amended Verified Complaint by filing either a motion or a responsive pleading. In any event, Plaintiff respectfully requests any/all relief pursuant to Fed. R. Civ. P. 16(f) that this Honorable Court deems appropriate.

Respectfully submitted this 7th day of April, 2022.

**THE NEWMAN LAW FIRM**

/s/ Russell A. Newman  
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*Attorney for Plaintiff Terpsehore Maras*

**CERTIFICATE OF SERVICE**

I, Russell A. Newman, do hereby certify that I am counsel for Plaintiff Terpsehore Maras in the above-captioned matter and that a copy of the **PLAINTIFF'S MOTION FOR STATUS CONFERENCE OR ORDER COMPELLING DEFENDANT ALI ABDUL RAZAK AKBAR A/K/A ALI ALEXANDER TO RESPOND TO PLAINTIFF'S AMENDED VERIFIED COMPLAINT** was filed and served via the CM/ECF system for the United States District Court, Eastern District of Tennessee, Chattanooga Division, which will cause service of same upon counsel of record in this matter and via U.S. Mail to the following non-registered users:

Ali Abdul Razaq Akbar a/k/a Ali Alexander  
5125 Pinellas Avenue  
Keller, TX 76244

Respectfully submitted this 7th day of April, 2022.

**THE NEWMAN LAW FIRM**

By: /s/ Russell A. Newman  
Russell A. Newman, BPR # 033462